

REMARKS

Claims 8, 11, 19 and 35 were objected to because of informalities. The suggested corrections of the examiner have been made and the objection is believed to have been addressed.

Claims 40-42 stand rejected under § 112 as being indefinite. The examiner objected to the phrase regarding insulation between the rows of conductors. It is believed that an objection would have been appropriate as it is clear based upon the reset of the phrase and would have been read by an ordinary artisan to mean that the insulation isolates the alternating ones of the rows of conductors. Applicant acknowledges that the phrasing was informal and awkward, and a correction has been made. It is believed that the scope of the claim remains the same, and that an artisan would have understood the claim as written. The amendment is made to expedite prosecution.

Claim 1-5, 11, 19-20, 22-27 and 32-35 stand rejected under § 103 over Li and Yoksza. The rejection is respectfully traversed.

The interpretation of the Li and Yoksza references is incorrect. Additionally, the combination of the two references makes no sense in view of their teachings.

The examiner relies upon Fig. 1A and the sensors 136, 140 and 144 of Li to allege that Li discloses an optically addressable pixel. This is incorrect. As discussed in column 1, beginning at line 25 of Li, Li discloses an imaging device. By imaging device it is clear that Li means a device which senses light and converts it into electrical signals

for use by electronics. The device in Fig. 1A, by use of separate color filters 124, 128, and 132, permits the acquisition of color image data. No emission device is responsive to the sensors. Instead, the sensors provide information to “a processor, such as a graphics processor” that can determine the approximate intensity and color of light striking the area in the proximity of the sensors 136, 140 and 144. Image data is obtained electronically and can be used for image reconstruction, but Li discloses no optically addressed pixel in which an output of a pixel is responsive to an emission sensor. Accordingly, the rejection as applied to independent claims 1, 19 and 32 is incorrect and unsupported by evidence.

Nor are the defects in Li cured by the addition of Yoksza. Yoksza does disclose a large scale LED display. Yoksza’s display, however, is clearly driven by electrical signals and does not admit of any manner for optically addressing the large scale display. As described with respect to Fig. 8, in column 4 beginning at line 38, LED modules are addressed through ribbon cable 110, and driver boards 114 that buffer commands and data signals, maintain power, and provide ground paths for the commands and data that are transmitted over the ribbon cable 110.

The examiner points to column 3, beginning at line 65 of Yoksza for the proposition that Yoksza has an emission device response to an emission sensor. No such teaching is found in that portion of Yoksza. That portion merely discusses the LED driver board 44 and states that commands and data are communicated through the electrical jack 42. None of the data displayed by LEDs and the LED modules 10 in

Yoksza is responsive to an emission sensor. The interpretation and conclusions regarding Yoksza are therefore also incorrect and form a separate basis for the traversal of the rejection as applied to independent claims 1, 19 and 32.

The rejection is also improper because the combination of Li and Yoksza is not supported by evidence and an artisan would not have been motivated to combine the references as contemplated by the examiner. As discussed above, Li in Fig. 1A discloses a device for the acquisition of color image data for processing by a processor. Yoksza discloses a large scale LED with modules that are addressed in typical fashion through input boards 112 and driver boards 114. The stated reason for the combination is that Li would benefit from the teachings of Yoksza because “it allows the module to be easily replaced without access to the rear of the display”. Yoksza does disclose replaceable modules for a large scale LED. On the other hand, however, Li is concerned with integrated devices with microlenses. The integrated devices in Li do not admit of the type of mechanical replacement of modules that is contemplated in Yoksza. Li discloses no large scale mechanically alterable devices whatsoever. Accordingly, the examiner’s conclusions regarding the combination are also incorrect and this forms another basis for the traversal of the rejection of independent claims 1, 19 and 32 and their associated dependent claims.

The rejection is respectfully traversed separately with respect to claims 2, 3 and 23. The examiner states that features of these claims are a matter of “designer’s choice”. To establish a *prima facie* case to reject the claims, the examiner must provide

evidence that the claims were not novel or obvious over the art. The labeling of the features of the claims as “design’s choice” does not discharge the duty of the Office to establish a *prima facie* case sufficient to reject the claims. The rejection should accordingly be withdrawn separately with respect to claims 2, 3 and 23.

The rejection is also separately traversed with respect to the claims concerning the particular manners of making electrical contact and the receptacle array details. This traversal includes claims 5, 11, 26, 27, 33 and 35. Consistent with the above discussion, Li discloses an integrated sensor device formed by typical microfabrication processes such as that disclosed in Fig. 5. Yoksza discloses a large scale LED display that includes modules that can be mechanically replaced. The two subjects of the Li and Yoksza patents have nothing to do with each other. There is no suggestion or teaching of how any mechanical changes could be made to the microfabricated structure of Li. Accordingly, the examiner’s reasoning with respect to Yoksza’s teaching of mechanical changes to Li’s microfabricated structure are without basis. Accordingly, the reasoning that claims 5, 11, 26, 27, 33 and 35 are obvious is respectfully traversed because microfabricated structures admit of no mechanical relationships such as those used in the large scale display disclosed in Yoksza. For example, with respect to claim 11, the microfabricated structure of Li could not have its individual pixels inserted into a receptacle array.

Claims 6-7, 21 and 28-30 stand rejected under § 103 over Li, Yoksza, and in further view of Mertz. The rejection is respectfully traversed.

As discussed above, the combination of Li and Yoksza fail to disclose or suggest an optically addressed display of any sort. The teachings are unrelated to each other. Accordingly, the rejection of independent claim 28 is separately traversed. Mertz does nothing to cure the deficiencies in the teachings of Li and Yoksza or in the alleged *prima facie* case discussed with respect to the traversal of the rejections above.

Claim 31 stands rejected under § 103 over Li in view of Mertz. The rejection is respectfully traversed.

There is no teaching in Li of sensor means that activate a means for producing displays of a plurality of colors. The examiner again relies upon Fig. 1. Fig. 1 of Li only discloses an image sensor that is responsive to color and can produce electronic data suitable for storage and image reconstruction. For this reason, the rejection is traversed as the rejection fails to properly interpret Li or apply it to the claim features.

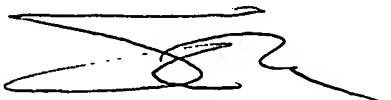
The many remaining rejections, explanations and rejections of dependent claims incorporate the defects discussed above. The rejections are traversed for the same reasons.

Other than the § 112 rejection, the examiner has not addressed claim 40. Claim 40 is deemed to be considered patentable because the art fails to disclose a receptacle array in accordance with claim 40.

For all of the above reasons, reconsideration and allowance of the application is requested. The above is believed to be a complete response to the office action.

Respectfully submitted,

GREER, BURNS & CRAIN, LTD.

By 
Steven P. Fallon
Registration No. 35,132

February 23, 2007

300 South Wacker Drive, Suite 2500
Chicago, Illinois 60606
(312) 360-0080
Customer No. 24978